

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

In re:

The Financial Oversight and Management Board  
for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**INFORMATIVE MOTION OF THE LAWFUL CONSTITUTIONAL DEBT  
COALITION REGARDING ITS REQUEST TO BE HEARD  
AT THE APRIL 24-25, 2019 OMNIBUS HEARING**

To the Honorable United States District Court Judge Laura Taylor Swain:

The Lawful Constitutional Debt Coalition (the “LCDC”)<sup>2</sup> submits this informative motion in response to the Court’s *Order Regarding Procedures for Attendance, Participation and Observation of April 24-25, 2019, Omnibus Hearing* (Dkt. 6240) (the “Order”), and respectfully states as follows:

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> The members of the LCDC and their respective holdings are set forth in the First Supplemental Verified Statement of the Lawful Constitutional Debt Coalition Pursuant to Federal Rule of Bankruptcy Procedure 2019 (Dkt. 5807).

1. Susheel Kirpalani, Deborah Newman, and Daniel Salinas of Quinn Emanuel Urquhart & Sullivan, LLP, co-counsel for the LCDC, plan to appear at the April 24-25 Hearing. Mr. Kirpalani will appear on April 24 only, in Courtroom 17C of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, NY 10007. Mr. Salinas and Ms. Newman will appear in the United States District Court for the District of Puerto Rico, 150 Carlos Chardón Street, Federal Building, San Juan, Puerto Rico 00918-1767 on April 24 and, if necessary, on April 25.

2. Mr. Kirpalani and Ms. Newman intend to present argument regarding to the following Documents (as defined in the *Eighth Amended Notice, Case Management and Administrative Procedures*, (Dkt. 4866-1)) filed by the LCDC:

- a. *Objection of the Lawful Constitutional Debt Coalition to the Motion of the Ad Hoc Group of General Obligation Bondholders, Under Bankruptcy Code Sections 105(a) And 502 and Bankruptcy Rule 3007, Establishing Procedures with Respect to Omnibus Conditional Objection to Claims Filed or Asserted by the Public Buildings Authority, Holders of Public Buildings Authority Bonds, and Holders of Certain Commonwealth General Obligation Bonds* (Dkt. 6181);
- b. *Objection of the Lawful Constitutional Debt Coalition to the Motion of the Financial Oversight and Management Board of Puerto Rico for Entry of an Order Equitably Tolling the Time Prescribed by 11 U.S.C. § 546 to Bring Certain Avoidance Actions* (Dkt. 6182);

3. The LCDC reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party in connection with the above-captioned Title III case to the extent it impacts the rights, claims, or interests of the LCDC.

DATED: April 19, 2019

Respectfully submitted,

REICHARD & ESCALERA

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*Co-Counsel for the Lawful Constitutional Debt Coalition*

**CERTIFICATE OF SERVICE**

I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/ Gustavo A. Pabón-Rico  
USDC-PR 231207